LAW OFFICES OF

## JOSHUA L. DRATEL, P.C.

A PROFESSIONAL CORPORATION

29 BROADWAY Suite 1412 NEW YORK, NEW YORK 10006

TELEPHONE (212) 732-0707 FACSIMILE (212) 571-3792 E-MAIL: JDratel@JoshuaDratel.com

JOSHUA L. DRATEL

—
LINDSAY A. LEWIS
WHITNEY G. SCHLIMBACH

STEVEN WRIGHT
Office Manager

January 30, 2015

## BY ELECTRONIC MAIL

Serrin Turner Timothy T. Howard Assistant United States Attorneys Southern District of New York One St. Andrew's Plaza New York, New York 10007

Re: *United States v. Ross Ulbricht* 14 Cr. 68 (KBF)

Dear Mr. Turner & Mr. Howard:

This letter is submitted on behalf of Ross Ulbricht, providing formal notice, pursuant to Rule 16(b)(1)(C), Fed. R. Crim. P., that the defense plans to call Steven M. Bellovin to provide expert testimony on the following subjects:

- 1. General principles of internet security and vulnerabilities;
- 2. The operation of timestamps in UNIX-based operating systems;
- 3. The import of some lines of PHP code provided to defense counsel in discovery;
- 4. Forensic memory analysis; and
- 5. General principles of public-key cryptography.
- 6. General issues related to linux-based operating systems, including security, implications of various linux kernel versions, differing methods of software installation, etc.

LAW OFFICES OF

## JOSHUA L. DRATEL, P.C.

Dr. Bellovin's Curriculum Vitae is attached hereto.

Very truly yours,

Jerline P. Delits

Joshua L. Dratel

JLD/